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January 18, 2024

Via ECF

The Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Sanchez v. Clipper Realty, Inc. et al.*,
Case No.: 21-cv-08502 (KPF)

Dear Judge Failla:

We are counsel to Plaintiff in the above-referenced case. We write to request an extension of time for Plaintiff to amend the pleadings in this matter. Pursuant to the Case Management Plan ("CMP") entered by the Court on December 19, 2023, "[a]ny motion to amend or to join additional parties shall be filed within 30 days from the date of this Order." *See* ECF 70. Plaintiff seeks an additional thirty (30) days to amend the Complaint, moving the date to amend from January 18, 2024, to February 17, 2024.

After two (2) years and three (3) months of litigation and pursuant to the directive found in the Court's CMP, Plaintiff received his own time and pay records on January 17, 2024. Plaintiff is currently reviewing the records and seeks time to determine if an amended Complaint will be necessary. For example, the records have revealed improper, one-directional rounding, which our office believes may already be encompassed by the pleadings, which allege timeshaving. Our office requires the additional time to review the records, speak with Plaintiff, review the pleadings, and discuss with Defendants.

Plaintiff requested Defendants' consent to extend this internal deadline today at 11:31 AM but, as of this filing, Defendants have not objected or consented to Plaintiff's request.

We thank the Court for its time and attention to the above matter.

Respectfully submitted,

/s/ C.K. Lee.

C.K Lee, Esq.

Application GRANTED. The Court understands from its communications with the parties that Defendants have consented to Plaintiff's request. Accordingly, the deadline for Plaintiff to file a Second Amended Complaint is hereby ADJOURNED to **February 17, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 71.

Dated: January 26, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE